

## United States District Court

SOUTHERN

DISTRICT OF  
McALLEN DIVISION

TEXAS

UNITED STATES OF AMERICA

V.

## CRIMINAL COMPLAINT

Romeo Horacio Garcia  
A202 076 594

YOB:

PRINCIPAL  
1992

United States

United States District Court  
Southern District of Texas  
FILED

Case Number:

M-14-1553-M

AUG 13 2014

(Name and Address of Defendant)

Clerk of Court

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 12, 2014 in Starr County, in the Southern District of Texas defendants(s) did,  
(Track Statutory Language of Offense)

knowing or in reckless disregard of the fact that Carlos Alfredo Carranza-Argueta, citizen and national of El Salvador, and Mariela Lopez-Jacobo, citizen and national of Guatemala, along with nine (9) other undocumented aliens for a total of eleven (11), who had entered the United States in violation of law, did knowingly transport, or move or attempt to transport said aliens in furtherance of such violation of law within the United States, that is, from a location near Edinburg, Texas to the point of arrest near La Gloria, Texas.

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(ii) FELONY  
I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On August 12, 2014, Texas Department of Public Safety Trooper B. Ruiz was conducting patrol duties near La Gloria, Texas. While doing so, he conducted a traffic stop on a 1999 blue GMC pick-up for speeding. As he approached the vehicle one subject fled on foot and was not located. He then noticed the driver and eleven subjects in total inside the vehicle and bed of the truck. Trooper Ruiz then contacted Border Patrol to assist in interviewing the subjects. Agents interviewed the driver, Romeo Horacio Garcia, and determined he was a United States citizen. The 11 passengers were also interviewed and admitted being illegally present in the U.S.

All of the subjects were then taken into custody and transported for further questioning. Based on material witness statements and his own admission, Garcia was linked to alien smuggling in this case. It was also determined the subject that absconded was identified as the foot guide.

SEE ATTACHED:

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

*Approved by  
Fred Hernandez*

Signature of Complainant

Sworn to before me and subscribed in my presence,

Frediberto Hernandez Senior Patrol Agent

Printed Name of Complainant

August 13, 2014  
Dateat McAllen, Texas  
City and StateDorina Ramos, U. S. Magistrate Judge  
Name and Title of Judicial Officer

Signature of Judicial Officer

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN, TEXAS**

**ATTACHMENT TO CRIMINAL COMPLAINT:**

**M-14-1553-M**

**RE: Romeo Horacio Garcia**

**A202 076 594**

**Principal Statement:**

Romeo Horacio Garcia was read his Miranda Rights and agreed to provide a statement.

Garcia stated he was at the Loves Truck Stop and was approached by two men who asked him if he wanted to make some quick cash. They explained he would transport some illegal aliens and a foot guide to Hebrronville and drop them off at a ranch. The two subjects gave Garcia \$100 for gas and after dropping the subjects off, he would be paid \$2,200. He agreed and the subjects took his vehicle and returned with the illegal aliens inside the truck. The foot guide was directing him to the drop off point and when the police pulled them over, the foot guide absconded.

\*After providing his statement and several hours later, Garcia approached Agents and advised he wanted to provide additional information and tell the truth as too what took place. He stated he picked up the illegal aliens at two seperate stash houses and he was staying at a trailer in close proximity to the houses. His instructions were to drop the subjects off at a white antenna in Hebronville where the illegal aliens would circumvent the checkpoint by foot. He would then pick the subjects up at a rest area on Highway 285 between Hebbbronville and Falfurrias. After that, he was going to transport the subjects to Houston and the foot guide would direct him to the stash house. Garcia stated the organization utilizes several scout vehicles as lookouts for any law enforcement personnel. He added their was one scout vehicle he was following during his arrest and once he crossed the checkpoint, another scout vehicle would be waiting in Mathis, Texas to guide him to Houston.

**Material Witness Statements:**

Both material witnesses were read their Miranda Rights and provided statements.

Carlos Alfredo Carranza-Argueta claimed to be a citizen of El Salvador and illegally entered into the U.S. Carranza stated he paid \$3,500 as an advance for his smuggling fee and would pay an additional \$3,500 when he arrived at his destination. Upon entry into the U.S., he was transported to a hotel in Edinburg near Monte Cristo Road. Carranza ultimately stated the pickup truck he was arrested in arrived and the driver instructed them to get into the truck. He sat in the cab area behind the driver's seat and noted the foot guide was sitting next to the driver. Carranza identified Romeo Horacio Garcia as the driver of the vehicle he boarded.

Mariela Lopez-Jacobo claimed to be a citizen of Guatemala and illegally entered into the U.S. Lopez stated she paid \$4,000 as an advance for her smuggling fee and would pay an additional \$2,000 when she arrived at her destination. After her entry, she was transported to several stash houses and ultimately picked up by the truck she was arrested in. She further stated the driver of the truck instructed them to get in and directed them how to sit inside the vehicle. She added they drove for approximately two hours before being pulled over by the police. Lopez identified Romeo Horacio Garcia as the driver of the vehicle she boarded.